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October 26, 2021

Via ECF

Hon. John G. Koeltl
United States District Court
Southern District of New York
40 Foley Square

Re: GUERRERO V. DBA LIVE SOUND COMPANY ET AL.
Please Update Court, Change to Validated Court
Civil Action Case No. 1:20-cv-01157

Dear Judge Koeltl:

This office represents defendants Live Sound Company, Kyle Long and Live International LTD, in the above matter and well as the two related actions. The parties in all three matters, *Guerrero v. DBA Live Sound Company*, 1:20-cv-01157; *Rodriguez v. Simeonidis*, 1:19-cv-08681 and *Simeonidis v. Kyle Long*, 1:21-cv-04179, have cooperated in completing discovery. However, I am writing to request an extension of 90 days for the parties to complete factual discovery in all three matters. The current factual discovery deadline in the *Guerrero* matter is November 1, 2021. All parties to these actions have agreed to this request.

The parties have completed plaintiff Rodriguez' deposition and plaintiff Guerrero's deposition is tentatively scheduled for November 1, 2021. In addition, the parties are actively conferring to schedule the remaining depositions.

One factor delaying the completion of discovery is that defendant/plaintiff Christina Simeonidis initiated a separate action, as a plaintiff, related to the same motor vehicle accident. That matter was filed in the United States District Court for the District of New Jersey. There were some procedural issues to be resolved before the case could be transferred and then tracked with the other matters as a related case. As noted above, all three matters are now noted as related cases and the parties are diligently working towards completing discovery.

*Application granted.
The parties should move
a revised scheduling order
by 11/5/21. So ordered.*

*JGK/J.G.Koeltl/U.S.D.J.
10/26/21*

Thank you for your attention to this matter.

Very truly yours,


Gregory E. Walthall

GEW:gew
Enclosures

cc: Michelle Jean-Jacques, Esq.,
Vincent Brescia, Esq. via NYSD-ECF,
Paul Cordella, Esq., via NYSD-ECF,
Ronald Dario, Esq. via Email, via NYSD-ECF